

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

JOSEPH WALKER,

Plaintiff,

v.

Case No. 20-CV-0487

CITY OF MILWAUKEE, *et al.*,

Defendants.

PLAINTIFF'S PROPOSED SPECIAL VERDICT FORM

NOW COMES Plaintiff Joseph Walker, by his attorneys, OVB Law & Consulting, S.C., and respectfully requests that the Court give the attached special verdict form.

Respectfully submitted this 2nd day of October 2023.

OVB Law & Consulting, S.C.
Attorneys for Plaintiff

Electronically signed by:
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VERDICT

We, the Jury, find as follows on the claims of the Plaintiff, Joseph Walker, against the Defendants Jeremy Gonzalez, Balbir Mahay, Daniel Clifford, Tanya Boll, Lisa Purcelli and the City of Milwaukee:

EXCESSIVE FORCE

1. Did any of the Defendants use unreasonable force in detaining or arresting Joseph Walker?

ANSWER: (a) Jeremy Gonzalez _____ YES _____ NO
 (b) Balbir Mahay _____ YES _____ NO
 (c) Daniel Clifford _____ YES _____ NO
 (d) Tanya Boll _____ YES _____ NO

If you answered "yes" to one or more Questions 1(a), 1(b), 1(c), or 1(d), then answer Question 2. If you answered "no" to all of these questions, then skip Question 2, and proceed directly to Question 3.

FAILURE TO INTERVENE

2. Did any of the following Defendant Officers have reason to know that any of the other Defendants were about to use unreasonable force against Joseph Walker, and have a realistic opportunity to stop them, but failed to do so?

ANSWER: (a) Jeremy Gonzalez _____ YES _____ NO
 (b) Balbir Mahay _____ YES _____ NO
 (c) Daniel Clifford _____ YES _____ NO
 (d) Tanya Boll _____ YES _____ NO
 (e) Lisa Purcelli _____ YES _____ NO

Proceed to Question 3.

FAILURE TO TRAIN

3. Did the City of Milwaukee fail to properly train the officers of the Milwaukee Police Department with respects to encountering situations involving individuals suffering from mental illness and/or experiencing crises situations?

ANSWER: _____ YES _____ NO

If you answered "yes" to one or more Questions 1(a), 1(b), 1(c), 1(d), 2(a), 2(b), 2(c), 2(d), 2(e) or Question 3 then answer Question 4. If you answered "no" to all of these questions, then skip Question 4.

COMPENSATORY DAMAGES

4. What amount of money will fairly and reasonably compensate Joseph Walker for his injuries resulting from the use of excessive force?

ANSWER: \$ _____.

PUNITIVE DAMAGES

If you answered "Yes" to one or more Questions 1(a) or Question 2(a), then answer Question 5 with respect to Defendant Jeremy Gonzalez. If you answered "No" to each of these questions, then put a line through Defendant Jeremy Gonzalez's name and do not answer as to him.

If you answered "Yes" to one or more Questions 1(b) or Question 2(b), then answer Question 5 with respect to Defendant Balbir Mahay. If you answered "No" to each of these questions, then put a line through Defendant Balbir Mahay's name and do not answer as to him.

If you answered "Yes" to one or more Questions 1(c) or Question 2(c), then answer Question 5 with respect to Defendant Daniel Clifford. If you answered "No" to each of these questions, then put a line through Defendant Daniel Clifford name and do not answer as to him.

If you answered "Yes" to one or more Questions 1(d) or Question 2(d), then answer Question 5 with respect to Defendant Tanya Boll. If you answered "No" to each of these questions, then put a line through Defendant Tanya Boll's name and do not answer as to her.

If you answered "Yes" to one Question 2(e), then answer Question 5 with respect to Defendant Lisa Purcelli. If you answered "No" to Question 2(e) then put a line through Defendant Lisa Purcelli name and do not answer as to her.

5. What amount of money, if any, do you assess as punitive damages against each of the following Defendants:

Jeremy Gonzalez \$ _____

Balbir Mahay \$ _____

Daniel Clifford \$ _____

Tanya Boll \$ _____

Lisa Purcelli \$ _____

FOREPERSON: _____

DATE: _____